



National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping Operations Containing Methylene Chloride (MeCl) at Area Sources

40 CFR Part 63, Subpart HHHHHH

This fact sheet provides important information on rule requirements for paint strippers that use methylene chloride (MeCl).

Additional information for motor vehicle and mobile equipment surface coating and coatings applied to plastic and/or metal substrate (miscellaneous surface coating) that contains hazardous air pollutants may be found in a separate fact sheet.

Paint stripping means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

Area Source of Hazardous Air Pollutant (HAP) is any stationary source that emits (or has the potential to emit) less than 10 tons per year (tpy) of a single HAP or 25 tpy of a combination of HAPs. Your "potential to emit" is the total amount of air contaminants that would be emitted if you could operate 24 hours a day for 365 days per year.

Most auto collision shops are area sources.

Does This Rule Apply to My Facility?

This rule applies to your facility if you use chemical strippers that contain MeCl to remove dried coatings (including but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates. **You do not have to comply with this rule if you do not use strippers that contain MeCl.**

What Are the Exemptions?

This rule does not apply to:

1. Paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance. This rule also does not apply when these operations are performed by individuals for others without compensation. However, an individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the rule regardless of whether compensation is received.
2. Paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (US) (including the Coast Guard and the National Guard of any State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration;
3. Paint stripping of military munitions, as defined in subsection 63.11180, manufactured by or for the Armed Forces of the US (including the Coast Guard and the National Guard of any State) or equipment directly and exclusively used for the purposes of transporting military munitions;
4. Paint stripping that meets the definition of "research and laboratory activities" in subsection 63.11180 of the final rule;
5. Paint stripping that meets the definition of "quality control activities" in subsection 63.11180 of the final rule; and
6. Paint stripping that is specifically covered by another area source NESHAP.

How Do I Comply and What Are the Notification Requirements?

This rule requires you to submit a Notification of Compliance Status Certification form, follow certain management requirements, and keep records. You may also have to submit an annual report and develop a minimization plan if you use more than one ton of a MeCl. Notification forms can be found on the NMED website at http://www.nmenv.state.nm.us/aqb/sbap/sbap_industry_sectors_3.html

What are the Management Requirements that I must follow?

This section is directed at paint stripping operations. If you are also a spray coating operation, review the appropriate fact sheets for either motor vehicle and mobile equipment surface coating operations or miscellaneous surface coating operations for more information.

Paint stripping operations that use **less than** one ton of MeCl annually must minimize evaporative emissions of MeCl. At a minimum you must:

1. Evaluate each application to ensure there is a need for paint stripping;
2. Evaluate each application using MeCl to ensure there is no alternative technology that can be used. Alternative technologies include: using paint strippers without MeCl, mechanical stripping, blasting, or thermal and cryogenic decomposition;
3. Reduce exposure of paint strippers containing MeCl to the air;
4. Optimize application conditions to reduce evaporation (e.g., maintaining low temperatures to reduce evaporation when the stripper is heated); and
5. Practice proper storage and disposal of paint strippers (e.g., store in closed, air-tight containers).

Paint Stripping operations that use **more than** one ton of MeCl annually must:

1. Develop and implement a written MeCl Minimization Plan to minimize the use and emissions of MeCl. The plan must address, at a minimum, the five management practices listed above;
2. Post a placard or sign outlining the MeCl minimization plan in each area where paint stripping using MeCl occurs;
3. Maintain a copy of the current MeCl Minimization Plan on site at all times; and
4. Review the plan every year and evaluate new methods of stripping, and keep records of the review and changes made to the plan.

Record Keeping:

Records must be kept for five years. They must be kept on site for two years and must include the following:

1. Records of annual usage of MeCl to demonstrate compliance with the rule.
This includes type of stripper containing MeCl, content of MeCl in the stripper, and how much of the stripper is used in a year. Additionally, if your operation uses more than one ton of MeCl, you must keep your MeCl minimization plan and records of any changes or updates to the plan.

2. Records of notifications and reports sent to NMED Air Quality Bureau;
3. Records of any deviation from the requirements of this rule, including the date and time, description, and corrective action taken regarding the deviation; and
4. Records verifying the compliance methods used in the preparation of the initial notification, certification of compliance, and annual notification of changes report.

Annual Reporting of Changes to the Facility:

You are required to submit an Annual Notification of Changes Report in each calendar year in which information originally submitted in the initial notification and compliance certification of compliance has changed or if a previous annual notification of changes report has changed. The annual notification of changes report also includes any deviations from the requirements regarding management practices outlined in this fact sheet. This includes notification when paint strippers that have not developed and implemented a written MeCl minimization plan uses more than one ton of MeCl in the previous calendar year.

The annual notification of changes report must be submitted before March 1 of each calendar year when reportable changes have occurred and must include the following information:

1. Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different; and
2. The name, title, address, telephone, e-mail address (if available) and signature of the certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

An Annual Notification of Changes Report form requiring the above information is available on the NMED website.

Do you still have questions?

If so, you can contact the New Mexico Small Business Environmental Assistance Program (SBEAP) at the number below for more information and guidance regarding your business. SBEAP is not an enforcement program; we are here to help you through the air quality process.

Air quality staff may be reached at (505) 222-9500

For Air Quality Permit Information in Bernalillo County, please call the Albuquerque Air Quality Division at (505) 768-1972.

Website link to subpart HHHHHH:

<https://www.ecfr.gov/cgi-bin/text-idx?node=sp40.15.63.hhhhhh>

We thank you for your interest in keeping New Mexico beautiful!